

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

WILLIAM R. KNOWLES,
Plaintiff,

vs.

SANDERSON FARMS, INC.,
Defendant.

§
§
§
§
§
§
§

CIVIL ACTION NO. 6:19-cv-359

DEFENDANT'S NOTICE OF REMOVAL

Defendant, Sanderson Farms, Inc., files this Notice of Removal pursuant to 28 U.S.C. §§ 1332(a), 1441(a), and 1446(a).

A. INTRODUCTION

1. Plaintiff is William R. Knowles ("Knowles" or "Plaintiff"). Defendant is Sanderson Farms, Inc. ("Defendant" or "Sanderson").

2. On May 2, 2019, Plaintiff sued Defendant for negligence in the 170th Judicial District Court of McLennan County, Texas. The case is styled Cause Number 2019-1550-4, *William R. Knowles v. Sanderson Farms, Inc.*, in the 170th Judicial District Court of McLennan County, Texas.

3. Defendant's registered agent, C T Corporation System, was served with a copy of the citation and Plaintiff's Original Petition on May 15, 2019. Defendant files this Notice of Removal within the 30-day time-period required by 28 U.S.C. § 1446(b)(1).

B. BASIS FOR REMOVAL

4. Removal is proper because there is complete diversity between the parties and the amount in controversy (as alleged by Plaintiff in his Original Petition) exceeds \$75,000.00, excluding interest and costs.

5. Plaintiff is a citizen of Texas. *See* Plaintiff's Original Petition, ¶ 2.0. Defendant is a Mississippi Corporation with its principal place of business and headquarters in Laurel, Mississippi. The diversity requirement of 28 U.S.C. § 1332(a) is satisfied.

6. Furthermore, Plaintiff has alleged that he seeks "damages in excess of \$200,000, but not more than \$1,000,000.00." The matter in controversy therefore exceeds \$75,000.00 as required by 28 U.S.C. § 1332(a).

7. Copies of all pleadings, process, orders, and other filings in the state-court suit obtained from the McLennan County District Clerk are attached to this Notice as required by 28 U.S.C. § 1446(a). *See* Exhibits "A" – "F."

8. Venue is proper in this district under 28 U.S.C. § 1441(a) because the state court where the suit has been pending is located in this district.

9. Defendant will promptly file a copy of this notice of removal with the clerk of the state court where the suit has been pending.

C. JURY DEMAND

10. Plaintiff did not demand a jury in the state-court suit.

D. CONCLUSION

11. WHEREFORE, Defendant removes this action from the 170th Judicial District Court, McLennan County, Texas, to this Court.

Respectfully submitted,

/s/ Jim Hering

JIM HERING

State Bar No. 00796744

hering@pakislaw.com

MARCUS MATAGA

State Bar Card No. 24083455

mataga@pakislaw.com

PAKIS, GIOTES, PAGE & BURLESON, P.C.

400 Austin Avenue, Suite 400

Post Office Box 58

Waco, Texas 76703-0058

(254) 297-7300 – Telephone

(254) 297-7301 – Facsimile

Attorneys for Defendant, Sanderson Farms, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record listed below via ECF on June 10, 2019, or if not in the ECF system, by email.

Humberto G. Garcia, PLLC
Humberto G. Garcia
hgarcia@outlook.com
hgarcia@salinaastrialaw.com

and

Law Offices of George Salinas
George L. Salinas, Jr.
George@salinaastrialaw.com

Attorneys for Plaintiff

/s/ Jim Hering

JIM HERING

EXHIBIT A

FILED
MCLENNAN COUNTY
5/2/2019 4:31 PM
JON R. GIMBLE
DISTRICT CLERK
Paige Edmundson

CAUSE NO. 2019-1550-4

WILLIAM R. KNOWLES	§	IN THE DISTRICT COURT
	§	
VS.	§	170TH JUDICIAL DISTRICT
	§	
SANDERSON FARMS, INC.	§	MCLENNAN COUNTY, TEXAS

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW WILLIAM R. KNOWLES, Plaintiff, and brings this action complaining of SANDERSON FARMS, INC., Defendant, and for cause of action, respectfully shows the following:

I. DISCOVERY CONTROL PLAN

1.0 Plaintiff intends that discovery be conducted under Discovery Level 3.

II. Parties

2.0 Plaintiff is a resident of Bexar County, Texas. The last 3 digits of Plaintiff's Texas driver's license number are 541.

2.1 Defendant is a Mississippi Corporation doing business in Waco, McLennan County, Texas, and may be served with process by serving its registered agent, CT Corporation System at their registered office located at 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136.

III. Venue Facts

3.0 Plaintiff is maintaining this cause of action in McLennan County, Texas because that is where a substantial part of the events or omissions giving rise to the claims in this lawsuit occurred. Venue is therefore proper in McLennan County pursuant to section 15.002 (a)(1) of the Texas Civil Practice and Remedies Code.

IV. Classification

4.0 Plaintiff brings this cause of action against the named Defendant for personal and bodily injuries caused by an incident which occurred on or about January 10, 2018, in Waco, Texas. All conditions precedent have been satisfied.

4.1 Plaintiff is seeking damages in excess of \$200,000, but not more than \$1,000,000.00.

V. Background Information

5.0 On or about January 10, 2018, Plaintiff was an invitee on Defendant's premises located at 301 Aviation Parkway in Waco, Texas as he was on the premises for delivering certain items on behalf of his employer and ordered by Defendant. He had just parked his truck on a loading dock at the subject premises and was exiting his truck. When he stepped down, he fell into a ditch that was supposed to be covered by grate covers. Plaintiff did not realize two or more of the grate covers were not in place until after he fell because there was no lighting to reveal the ditch. He then noticed that the missing grate covers were actually in the ditch. There was no sign or notice warning of the missing grate covers.

VI. Negligent Actions

6.0 On the occasion in question, Defendant violated the duty which it owed to Plaintiff and all invitees to exercise ordinary care in maintaining its premises in a safe condition in one or more of the following respects:

- a. In failing to provide adequate lighting to reveal to invitees such as Plaintiff the actual condition of the premises;
- b. In failing to maintain and secure that the subject ditch was properly covered;
- c. In failing to timely and regularly inspect the premises which would have revealed the displacement of the grate covers;

d. In failing to correct the displaced grate covers to prevent anyone from falling as happened to Plaintiff;

e. In failing to warn Plaintiff of the displaced grate covers; and

6.1 Plaintiff would further show that the above and foregoing acts were separate and distinct acts of negligence and that they are the direct and proximate cause of the incident in question and the Plaintiff's resultant injuries as will be more accurately described herein below.

6.2 Each of these acts and omissions, singularly or in combination with such other acts and omissions constituted negligence which proximately caused the accident made the basis of this lawsuit, and the damages and injuries suffered by the Plaintiff.

VII. Plaintiff's Damages

7.0 As a result of the collision made the basis of this action, Plaintiff has suffered serious injuries to his body as a whole in that said injuries caused him to suffer severe physical pain and mental anguish in the past. In all reasonable probability, he will continue to so suffer such physical pain and mental anguish in the future.

7.1 As a further result of the Defendant's negligence, Plaintiff has incurred reasonable and necessary medical expenses in the past and in all probability, will continue to so incur reasonable and necessary medical expenses in the future.

7.2 Plaintiff will show that as a result of the injuries he sustained due to the Defendant's negligence, he suffered physical impairment in the past and in all reasonable probability, will continue to so suffer physical impairment in the future.

VIII. PRE-JUDGMENT & POST JUDGMENT INTEREST

8.0. Plaintiff further alleges that she is entitled to recover pre-judgment and post-judgment interest at the maximum legal rate as provided for by law.

8.1 By reason of all of the above and foregoing elements, Plaintiff has suffered losses and damages in a sum within the jurisdictional limits of this Court and for which he hereby sues said Defendant.

IX. REQUEST FOR DISCLOSURE

9.0 Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiff hereby request that Defendant discloses on or before the first business day following the expiration of fifty (50) days from Defendant's receipt of service of this Petition, the information and material described in Tex. R. Civ. P. 194.2 (a) – (l).

X. PRAYER FOR RELIEF

10.0 **WHEREFORE, PREMISES CONSIDERED**, Plaintiff respectfully prays for the following:

- A. That Defendant be cited to appear herein;
- B. That after trial on the merits, the Honorable Court enters judgment against Defendant and in favor of Plaintiff for actual damages, consequential damages, incidental damages, compensatory damages, mental anguish damages, costs of court, and expenses of the lawsuit, pre-judgment interest, and post-judgment interest, as allowed by law or as plead herein; and
- C. For all such further and additional relief to which Plaintiffs are justly entitled at law and in equity.


Respectfully submitted,

HUMBERTO G. GARCIA, PLLC
6243 IH-10 West, Suite 955
San Antonio, Texas 78201
Tel: 210-225-0909
Fax: 210-960-4604

By: /s/ Humberto G. Garcia
Humberto G. Garcia
Texas State Bar No. 07636620
hgarcia@outlook.com
hgarcia@salinastriallaw.com

AND

LAW OFFICES OF GEORGE SALINAS
6243 IH-10 West, Suite 955
San Antonio, Texas 78201
Tel: 210-225-0909
Fax: 210-960-4604

By: 

George L. Salinas, Jr.
Texas State Bar No. 24044929
George@salinastriallaw.com
COUNSEL FOR PLAINTIFF

EXHIBIT B

2019-1550-4

Cause Number: _____

District Court : _____

FILED
MCLENNAN COUNTY
5/2/2019 4:31 PM
JON R. GIMBLE
DISTRICT CLERK
Paige Edmundson

Request for ProcessStyle: WILLIAM R. KNOWLES Vs. SANDERSON FARMS, INC.

Request the following process: (Please check all that Apply)

☒ Citation ☐ Notice ☐ Temporary Restraining Order ☐ Notice of Application for Protective Order
☐ Temporary Protective Order ☐ Precept with hearing ☐ Precept without a hearing ☐ Writ of Attachment
☐ Writ of Habeas Corpus ☐ Writ of Garnishment ☐ Writ of Sequestration ☐ Capias ☐ Other: _____

1.

Name: SANDERSON FARMS, INC.Registered Agent/By Serving: CT Corporation SystemAddress 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3136

Service Type: (Check One) ☒ Private Process ☐ Sheriff ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door
☐ Certified Mail ☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable Pct _____
(Pct. 3 serves process countywide)

2.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Sheriff ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door
☐ Certified Mail ☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable Pct _____
(Pct. 3 serves process countywide)

3.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Sheriff ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door
☐ Certified Mail ☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable Pct _____
(Pct. 3 serves process countywide)

4.

Name: _____

Registered Agent/By Serving: _____

Address _____

Service Type: (Check One) ☐ Private Process ☐ Sheriff ☐ Commissioner of Insurance ☐ SA Express News ☐ Hart Beat ☐ Courthouse Door
☐ Certified Mail ☐ Registered Mail ☐ Out of County ☐ Secretary of State ☐ Constable Pct _____
(Pct. 3 serves process countywide)

Title of Document/Pleading to be Attached to Process: Plaintiff's Original PetitionName of Attorney/Pro se: George L. Salinas, Jr.Bar Number: 24044929

Address: 6243 IH-10 West, Suite 955
San Antonio, Texas 78201

Phone Number: 210 225-0909Attorney for Plaintiff ☒ Defendant _____ Other _____

****IF SERVICE IS NOT PICKED UP WITHIN 14 BUSINESS DAYS, SERVICE WILL BE DESTROYED****

EXHIBIT C

[Print this page](#)**Case # 2019-1550-4 - WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC. (170TH)****Case Information**

Location	McLennan County - District Clerk
Date Filed	5/2/2019 4:31 PM
Case Number	2019-1550-4
Case Description	WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC.
Assigned to Judge	170TH
Attorney	George Salinas, Jr.
Firm Name	Law Offices of George Salinas, PLLC
Filed By	Zhenya Hood
Filer Type	Not Applicable
Damages Sought	Over \$200,000 but not more than \$1,000,000

Fees

Convenience Fee	\$10.30
Total Court Case Fees	\$298.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$53.00
Total Court Service Fees	\$2.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$2.99
Total Provider Tax Fees	\$0.25
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$366.54

Payment

Account Name	RR Visa
Transaction Amount	\$366.54
Transaction Response	Approved
Transaction ID	49897730
Order #	033267043-0

*Prig Edmundson*JOHN R. GRIFFIN
DISTRICT CLERK
MCLENNAN CO. TX

2019 MAY -3 AM 9:08

FILED

Petition

Filing Type	EFileAndServe
Filing Code	Petition
Filing Description	Plaintiff's Original Petition
Reference Number	2695061

Envelope Details

Page 2 of 3

Comments

Status Accepted
 Accepted Date 5/3/2019 8:58 AM

Fees

Court Fee \$0.00
 Service Fee \$0.00

Documents

Lead Document Plaintiff's Original Petition.pdf [Original] [Transmitted]

eService Details

Name/Email	Firm	Service Method	Status	Served	Date/Time Opened
George Luis Salinas, Jr. george@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Humberto Garcia hgarcia@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Zhenya Hood zhenya@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
George Luis Salinas, Jr. george@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Humberto Garcia hgarcia@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Zhenya Hood zhenya@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened

Petition

Filing Type EFileAndServe
 Filing Code Petition
 Filing Description Request for Process
 Reference Number 2695089
 Comments
 Status Accepted
 Accepted Date 5/3/2019 8:58 AM

Fees

Court Fee	\$53.00
Service Fee	\$0.00

Optional Services

Issue Citation	\$8.00
Jury Fee	\$40.00
Copies - Service	\$5.00 (5 x \$1.00)

Documents

<i>Lead Document</i>	Request for Process.pdf	<u>[Original]</u>	<u>[Transmitted]</u>
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eService Details

Name/Email	Firm	Service Method	Status	Served	Date/Time Opened
George Luis Salinas, Jr. george@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Humberto Garcia hgarcia@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Zhenya Hood zhenya@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
George Luis Salinas, Jr. george@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Humberto Garcia hgarcia@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Zhenya Hood zhenya@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened

EXHIBIT D

CITATION

**PAPER# 1
ATTY**

THE STATE OF TEXAS

COPY

Cause No: 2019-1550-4

TO: SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION, DEFENDANT - BY SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM, AT 1999 BRYAN STREET, SUITE 900, DALLAS, TEXAS 75201

GREETINGS:

YOU ARE HEREBY COMMANDED to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, and you are hereby served with a copy of Plaintiff's Discovery described below, to which you must file a written answer as required by law in the cause number described below on the docket of said court, and styled,

PARTIES TO THIS ACTION ARE:

WILLIAM R. KNOWLES

Plaintiff

VS.

SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION

Defendant

Court: 170TH JUDICIAL DISTRICT

Pleading: PLAINTIFF'S ORIGINAL PETITION

Pleading File Date: MAY 2, 2019

Discovery Requests: REQUEST FOR DISCLOSURE

Cause No: 2019-1550-4

NOTICE

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading and discovery, a default judgment may be taken against you.

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.

Issue Date: MAY 9, 2019.

HUMBERTO G. GARCIA

6243 IH-10 WEST

SUITE 955

SAN ANTONIO, TEXAS 78201

Attorney for Plaintiff

Jon R. Gimble, District Clerk

501 Washington Ave., Suite 300 Annex

Waco, McLennan County, Texas 76701

By: Paige Edmundson, Deputy
PAIGE EDMUNDSON

tu

RETURN OF SERVICE

Style: **WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION**

Cause No.: **2019-1550-4**

Court: **170TH JUDICIAL DISTRICT**

Paper#: **1**

Instrument(s) Served: Pleading, **PLAINTIFF'S ORIGINAL PETITION**, and Discovery, **REQUEST FOR DISCLOSURE**

Came to hand on the ____ day of _____, 20____ at ____ o'clock ____ M. and executed on the ____ day of _____, 20____ by delivering to the party designated in the citation, to-wit:

at ____ o'clock ____ M; in person, a true copy of this citation with a true and correct copy of the pleading and discovery attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy

Total \$ _____

**NO SHERIFF OR CONSTABLE
FEES COLLECTED**

_____ County, Texas

By _____

NOT EXECUTED FOR THE FOLLOWING REASONS _____

and having attempted on _____.

"My name is _____ (First) _____ (Middle) _____ (Last), my
date of birth is _____, and my address is _____
_____.

I declare under penalty of perjury that the foregoing is true and correct. Executed in _____ County, State
of Texas, on the _____ day of _____ (Month) _____ (Year)

_____ (Signature) Declarant"

EXHIBIT E

CITATION

THE STATE OF TEXAS

Cause No: 2019-1550-4

FILED
MCLENNAN COUNTY PAPER# 1
5/16/2019 3:29 PM ATTY
JON R. GIMBLE
DISTRICT CLERK
Paige Edmundson

TO: SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION, DEFENDANT - BY SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM, AT 1999 BRYAN STREET, SUITE 900, DALLAS, TEXAS 75201

GREETINGS:

YOU ARE HEREBY COMMANDED to appear before the Honorable District Court below, of McLennan County, Texas, at the Courthouse of said County located at 501 Washington Avenue in Waco, Texas, by filing a written answer with the Clerk of the Court, at or before 10 o'clock A.M. of the Monday next after the expiration of twenty days after the date of service of this citation, to the pleading described below, and you are hereby served with a copy of Plaintiff's Discovery described below, to which you must file a written answer as required by law in the cause number described below on the docket of said court, and styled,

PARTIES TO THIS ACTION ARE:

WILLIAM R. KNOWLES

Plaintiff

VS.

SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION

Defendant

Court: 170TH JUDICIAL DISTRICT

Pleading: PLAINTIFF'S ORIGINAL PETITION

Pleading File Date: MAY 2, 2019

Discovery Requests: REQUEST FOR DISCLOSURE

Cause No: 2019-1550-4

NOTICE

You have been sued. You may employ an attorney. If you or your attorney does not file a written answer with the clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and the above pleading and discovery, a default judgment may be taken against you.

The officer executing this citation shall promptly serve the same according to requirements of law, and the mandates hereof, and make due return as the law directs.

ISSUED AND GIVEN UNDER MY HAND AND SEAL OF OFFICE, at Waco, McLennan County, Texas.

Issue Date: MAY 9, 2019.

HUMBERTO G. GARCIA
6243 IH-10 WEST
SUITE 955
SAN ANTONIO, TEXAS 78201
Attorney for Plaintiff

Jon R. Gimble, District Clerk
501 Washington Ave., Suite 300 Annex
Waco, McLennan County, Texas 76701

By: Paige Edmundson, Deputy
PAIGE EDMUNDSON

W

RETURN OF SERVICE

Style: **WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC., A MISSISSIPPI CORPORATION**

Cause No.: **2019-1550-4**

Court: **170TH JUDICIAL DISTRICT**

Paper#: **1**

Instrument(s) Served: Pleading, **PLAINTIFF'S ORIGINAL PETITION**, and Discovery, **REQUEST FOR DISCLOSURE**

Came to hand on the ____ day of _____, 20____ at ____ o'clock ____ M. and executed on the ____ day of _____, 20____ by delivering to the party designated in the citation, to-wit:

at ____ o'clock ____ M; in person, a true copy of this citation with a true and correct copy of the pleading and discovery attached thereto, having first endorsed on such copy of said citation the date of delivery.

FEES: Serving one (1) copy _____

Total \$ _____
NO SHERIFF OR CONSTABLE
FEES COLLECTED

County, Texas

By _____

NOT EXECUTED FOR THE FOLLOWING REASONS _____

and having attempted on _____.

"My name is _____ (First) _____ (Middle) _____ (Last), my date of birth is _____, and my address is _____
_____.

I declare under penalty of perjury that the foregoing is true and correct. Executed in _____ County, State of Texas, on the _____ day of _____ (Month) _____ (Year)

(Signature) Declarant"

AFFIDAVIT OF SERVICE

State of Texas

County of McLennan

170th Judicial District Court

Case Number: 2019-1550-4

Plaintiff:
William R. Knowles



vs.

Defendant:
Sanderson Farms, INC

Received by Caleb Malone PSC 1574 exp 10/31/20 on the 14th day of May, 2019 at 9:50 am to be served on **Sanderson Farms Inc, A Mississippi Corporation By Serving Its Registered Agent CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201.**

I, Caleb Malone PSC 1574 exp 10/31/20, being duly sworn, depose and say that on the **15th day of May, 2019 at 10:30 am, I:**

served a **REGISTERED AGENT** by delivering a true copy of the **Citation / Plaintiff's Original Petition** with the date and hour of service endorsed thereon by me, to: **Antoinette Williams Intake Associate for Ct Corporation System as Registered Agent** at the address of: **1999 Bryan Street, Suite 900, Dallas, TX 75201** on behalf of **Sanderson Farms Inc, A Mississippi Corporation**, and informed said person of the contents therein, in compliance with state statutes.

I certify that I am over the age of 18, of sound mind, have no interest in the above action, and am a Certified Process Server, in good standing, in the jurisdiction in which this service was made.

The facts stated in this affidavit are within my personal knowledge and are true and correct.

A large, stylized handwritten signature in black ink, consisting of a large loop followed by a vertical stroke and a horizontal base.

Caleb Malone PSC 1574 exp 10/31/20
Process Server

Subscribed and Sworn to before me on the 15
day of May, 2019 by the affiant
who is personally known to me.

A handwritten signature in black ink, appearing to read "Bethany Pallister".

NOTARY PUBLIC

Our Job Serial Number: BBW-2019003839

Copyright © 1992-2019 Database Services, Inc. - Process Server's Toolbox V8.1c

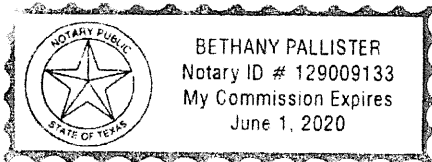


EXHIBIT F

Print this page**Case # 2019-1550-4 - WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC. (170TH)****Case Information**

Location	McLennan County - District Clerk
Date Filed	5/16/2019 3:29 PM
Case Number	2019-1550-4
Case Description	WILLIAM R. KNOWLES VS. SANDERSON FARMS, INC.
Assigned to Judge	170TH
Attorney	George Salinas, Jr.
Firm Name	Law Offices of George Salinas, PLLC
Filed By	Zhenya Hood
Filer Type	Not Applicable

Fees

Convenience Fee	\$0.15
Total Court Case Fees	\$0.00
Total Court Party Fees	\$0.00
Total Court Filing Fees	\$0.00
Total Court Service Fees	\$2.00
Total Filing & Service Fees	\$0.00
Total Provider Service Fees	\$2.99
Total Provider Tax Fees	\$0.25
Total Taxes (for non-court fees)	\$0.00
Grand Total	\$5.39

Payment

Account Name	RR Visa
Transaction Amount	\$5.39
Transaction Response	Approved
Transaction ID	50428134
Order #	033639094-0

Nicole Madison

FILED
2019 MAY 17 AM 9:19
JURY, GEORGE
DISTRICT CLERK
MCLENNAN CO. TX.
FFP/TV

No Fee Documents

Filing Type	EFileAndServe
Filing Code	No Fee Documents
Filing Description	Return Citation - Sanderson Farms, Inc.
Reference Number	2717163
Comments	

Envelope Details

Page 2 of 2

Status Accepted
 Accepted Date 5/17/2019 8:42 AM
Fees
 Court Fee \$0.00
 Service Fee \$0.00
Documents
Lead Document Return Citation - Sanderson Farms, Inc.pdf [Original] [Transmitted]

eService Details

Name/Email	Firm	Service Method	Status	Served	Date/Time Opened
George Luis Salinas, Jr. george@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	5/16/2019 4:12 PM
Zhenya Hood zhenya@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	Not Opened
Humberto Garcia hgarcia@salinastriallaw.com	Law Offices of George Salinas, PLLC	EServe	Sent	Yes	5/16/2019 4:11 PM